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October 15, 2004

RE: Comments on Potential Changes to Energy Star Criteria for Residential Clothes Washers

The Planning and Conservation League is dedicated to planning and natural resource conservation, air and water quality, environmental justice, and sustainable energy. PCL is a supportive member of the California Urban Water Conservation Council and advocate for the implementation of the Council's 14 Best Management Practices (BMP) for water efficiency in California. One of these BMP's requires that water utility agencies provide financial incentives for high-efficiency clothes washers. As a result, California has had considerable experience in the issues associated with attracting consumers to these appliances.

Because the Energy Star criteria for high-efficiency clothes washers currently do not include a specific water factor, there has been confusion among consumers and water utilities alike. A presumption of water efficiency has generally been made by the consumer when purchasing an Energy Star-labeled clothes washer, and in California with financial incentives now tied to the water factor, there have been unhappy consumers who purchased Energy Star washers who could not qualify for rebates from their local water utility for their clothes washer because it had a high water factor rating.

Further compounding the issue is the set of standards adopted in 2004 by the California Energy Commission, requiring that residential clothes washers sold in California meet a water factor standard of 8.5 by 2007 and a water factor standard of 6.0 by 2010.

The Planning & Conservation League would like to express our firm support for an Energy Star water factor requirement of 7.5. A water factor requirement at this level would be consistent with the California Energy Commission standard taking effect in 2007; it would send the message to millions of California consumers that Energy Star washers are even more efficient.

We also recognize that the U.S. Environmental Protection Agency is exploring water appliance labeling opportunities at this time. Our support expressed herein is not meant to convey that we would not also support a water label, even if a separate label. Because of Energy Star's remarkable consumer recognition, adding a water factor requirement to Energy Star would be an improvement, would greatly alleviate the current market confusion on high-efficiency washers, and should be pursued independently of an EPA effort on a water labeling program.

Thank you,

Mindy McIntyre
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California Affiliate

